



Driving progress
through partnership

Rebecca R. Hanson

Direct Phone: +1 312 207 2428

Email: rhanson@reedsmith.com

Molly E. Nehring

Direct Phone: +1 312 207 2846

Email: mnehring@reedsmith.com

Reed Smith LLP
10 South Wacker Drive
Chicago, IL 60606-7507
+1 312 207 1000
Fax +1 312 207 6400
reedsmith.com

March 13, 2025

Via ECF

Magistrate Judge Gary Stein

U.S. District Judge, Southern District of New York

Daniel Patrick Moynihan U.S. Courthouse

500 Pearl Street

New York, New York 10007-1312

MEMO ENDORSED

**Re: *M.R. v. United Healthcare Insurance Company, et al.*,
No. 1:23-CV-4748 (S.D.N.Y.)**

Dear Judge Stein:

We represent Defendants UnitedHealthcare Insurance Company, United Behavioral Health (collectively, “United”), Pfizer Inc. (“Pfizer”), and the Pfizer Health and Welfare Benefit Plan (the “Plan” and together with United and Pfizer, “Defendants”) in the above-referenced matter. Together with Plaintiff M.R. (“Plaintiff” and together with Defendants, the “Parties”), the Parties submit this Letter Brief requesting a ninety-day (90) stay of this proceeding pending final approval of a settlement agreement in a related class action. In support of this request, the Parties state as follows:

As Your Honor is aware, Plaintiff has been identified as a class member in the *R.B. v. United Behavioral Health* class action, Case No. 1:21-CV-00553, currently pending in the Northern District of New York (the “Class Action”). On January 17, 2025, the court in the Class Action preliminarily approved a settlement agreement (“January Order”) which is set for final approval hearing on May 28, 2025. As part of the January Order, the court preliminarily enjoined class members from asserting any of the claims released as part of the settlement, which Defendants believe includes the claims at issue in this case. On February 5, 2025, counsel for the Parties were before Your Honor at which time a briefing schedule was set for Defendants’ Motion to Stay pending Class Action Proceeding (Dkt. No. 63), which schedule was amended on February 19, 2025 (Dkt. No. 67) to allow the Parties time to confer on settlement.

On March 12, 2025, the Parties conferred, at which time Plaintiff’s counsel confirmed Plaintiff had received notice of the Class Action settlement and indicated Plaintiff intends to object to that settlement before the Class Action court.

Accordingly, in light of the above, the Parties respectfully request i) a ninety-day (90) stay of this proceeding to allow Plaintiff to continue to pursue issues related to the Class Action settlement, avoid unnecessary briefing, and provide additional time for the Parties to confer on settlement and ii) that the Parties be ordered to submit a joint status report in ninety (90) days.

ReedSmith

Magistrate Judge Gary Stein
March 13, 2025
Page 2

Respectfully submitted,

/s/ Rebecca R. Hanson

Molly E. Nehring
Rebecca R. Hanson (admitted *pro hac vice*)
Reed Smith LLP
10 S. Wacker Drive, 40th Floor
Chicago, IL 60606
mnehring@reedsmith.com
rhanson@reedsmith.com

Attorney for Defendants

/s/ Brian S. King (with permission)

Brian S. King
Brian S. King, PC
420 E. South Temple, Suite 420
Salt Lake City, UT 84111
brian@briansking.com

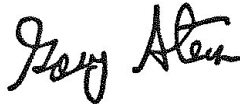
Attorney for Plaintiff

cc: Counsel of Record (via CM/ECF)

Application granted. This action shall be stayed for 90 days for the reasons cited in this letter and in view of the pending class action settlement in R.B. v. United Behavioral Health, Case No. 21 Civ. 00553, in the Northern District of New York. The parties are directed to submit a joint status letter by no later than Friday, June 13, 2025.

**Date: March 17, 2025
New York, NY**

SO ORDERED:



**HON. GARY STEIN
UNITED STATES MAGISTRATE JUDGE**